## REMARKS

Upon entry of the instant Amendment, Claims 1-16 are pending. Claims 1, 7, and 12 have been amended, and claim 16 has been added to more particularly point out Applicants' invention. The Specification has been amended to change the title. No new matter has been added.

The Specification was objected to because the title was alleged to not be descriptive. The title has been amended to APPARATUS AND METHOD FOR DISPATCHING MESSAGES AMONG REGISTERED SOFTWARE MODULES IN A TELECOMMUNICATIONS SYSTEM INCLUDING A TELEPHONY INTERNET SERVER COUPLED BETWEEN A PACKET NETWORK AND A PRIVATE BRANCH EXCHANGE. Thus, Applicants respectfully submit the objection is obviated.

Claims 1, 6, 7, and 12-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over Gudjonsson et al., U.S. Patent No. 6,564,261 ("Gudjonsson") in view of Draginich et al., U.S. Patent No. 6,560,329 ("Draginich"), and Coulouris et al., Distributed System Concepts and Design, 2d. Ed. ("Coulouris"). Applicants respectfully submit that the claimed invention is not taught, suggested, or implied by Gudjonsson, Draginich, or Coulouris, either singly or in combination.

As discussed in the Specification, embodiments of the present invention provide a system and method for adding software features to a system such as a telecommunications system including a telephony Internet server. Briefly, a dispatcher is provided for delivering messages between dispatcher clients, i.e., software subsystems that may be in the same process, a different process, or on a different machine, that may need updates, etc. The dispatcher manages a pool of threads to balance the workload. The dispatcher can process both synchronous and asynchronous messages by dispatching the message to all registered subsystems in order of their registered priority. Subsystems register for receiving predetermined messages. The dispatcher maintains a database of their destinations. The dispatcher itself needs to have no knowledge of the contents of messages that are to be sent;

likewise, the sender software subsystems need have no knowledge of the corresponding destinations.

Thus, claim 1 has been amended to recite, inter alia, "a software dispatcher in a telephony Internet server coupled between a packet network and a private branch exchange, the software dispatcher configured to add software system application features associated with said private branch exchange and said packet network". Similarly, claim 7, as amended, recites "maintaining a list of message receivers at a software dispatcher, said software dispatcher configured to add software features to software subsystems, said message receivers comprising software subsystems" and claim 12 recites "the server including a software dispatcher adapted to receive and dispatch one or more messages for adding software features to one or more software subsystems."

In contrast, Gudjonsson appears to relate merely to a system and method for call routing, i.e., between end users of such devices as mobile phones. The system allows the user to manage communications using a buddy list and provides for the user to, among other things, hide personal information from other users. Gudjonsson does not appear to provide for adding software features to software subsystems, as generally recited in the claims at issue.

Similarly, Draginich relates to a call agent system, including a call server 22. The call server 22 depends on "call arrival data intrinsic to the network," such as automatic number identification (ANI) data for routing the call. See col. 5, lines 17-27. To route the call, the controller 20 "analyzes the associated call information for matches." See col. 6, lines 45-47. Thus, like Gudjonsson, Draginich does not appear to relate to, inter alia, adding software features to software subsystems.

Coulouris is relied on merely for allegedly teaching dispatching messages synchronously and asynchronously. Like Draginich and Gudjonsson, however, Coulouris does not appear to provide for adding software features to software

subsystems in a system as claimed. As such, the Examiner is respectfully requested to reconsider and withdraw the rejection of the claims.

Claims 2-5 and 8-11 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Gudjonsson, Draginich, Coulouris, in view of Elliott et al., U.S. Patent No. 6,335,927 ("Elliott"). Applicants respectfully submit that the claimed invention is not taught, suggested, or implied by Gudjonsson, Draginich, Coulouris, or Elliott, either singly or in combination

Gudjonsson, Draginich, and Coulouris have been discussed above. Elliott is relied on for allegedly teaching saving, prioritizing, and sending messages as flexible message parameters. However, like Gudjonsson, Draginich, and Coulouris, Elliott does not appear to relate to updating a software subsystem as claimed. Thus, like Gudjonsson, Draginich, and Coulouris, Elliott does not appear to relate to the problem solved by the present invention. As such, the Examiner is respectfully requested to reconsider and withdraw the rejection of the claims.

For reasons similar to those discussed above, newly added claim 16 is likewise believed allowable.

For all of the above reasons, Applicants respectfully submit that the application is in condition for allowance, which allowance is earnestly solicited.

Respectfully requested,

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